

John Doe

February 5, 2024

VIA E-MAIL and CM/ECF

Hon. Gary Stein
United States Magistrate Judge
Southern District of New York

Re: *Doe v. The Federal Republic of Germany et al*, Case No. 1:23-cv-06395-VSB-GWG
(S.D.N.Y.)

Dear Judge Stein:

In response to your Opinion and Order of January 22, 2024, while reserving all rights, I write to inform you that I am conditionally willing to provide my identity, physical address and telephone number to the Court depending upon the robustness of the alternative sealing process proposed. I appreciate the Court's willingness to consider such a process, though I would note that it must not be disclosed publicly on the docket or to other Court staff unnecessarily, and should preferably be transmitted only directly to the e-mail address below.

Without delving into specifics, there are a few options that may prove acceptable to mitigate the serious risks involved. However, for my safety and the safety of others, I may respectfully reject the Court's proposal or suggest changes, within reason. I remain concerned that the Court has already proven unable to protect sensitive information and that it underestimates various risks. Finally, I find Judge Boasberg's cursory analysis deeming the Russian Federation—which has already broken into CM/ECF—no more sophisticated or threatening than the Taliban or prison gangs, deeply flawed.

Signed,

/s/John Doe

John Doe

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Plaintiff